

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	Case No: 1:15 CV 1046
	)	
Plaintiff	)	JUDGE SOLOMON OLIVER, JR.
	)	
v.	)	
	)	
CITY OF CLEVELAND,	)	
	)	
Defendant	)	DECLARATION OF RICK STONE
	)	

For his Declaration, Rick Stone states as follows:

1. I have first-hand knowledge of the facts set forth herein in my duties as acting Lieutenant, Record Section, Cleveland Division of Police (CDP).
2. I am the current terminal agency coordinator (TAC) for CDP, appointed under Ohio Administrative Code 4501:2-10, and charged with the responsibility of overseeing CDP's use of the Law Enforcement Automated Data System (LEADS) maintained by the Ohio Department of Public Safety.
3. One of my responsibilities as LEADS TAC for CDP is to ensure that LEADS data is not used for non-law enforcement purposes.
4. I am concerned that allowing unrestricted access to LEADS data maintained by the City in non-LEADS databases and programs, for any purposes other than law enforcement, may be a violation of my duties as LEADS TAC and potentially represent a violation of R.C. § 2913.04.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

**EXHIBIT**  
**F**

Executed on March 16, 2024.

Signed:

  
R. St #9253 Act. Lt.

ACTING LIEUTENANT  
RICK STONE

Respectfully submitted,

*/s/ Mark D. Griffin*

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MARK D. GRIFFIN (0064141)  
Director of Law  
Delanté Spencer Thomas (0096349)  
Chief Assistant Director of Law  
City of Cleveland  
601 Lakeside Ave. E  
City Hall Room 106  
Cleveland, OH 44114  
(216) 664-2800  
mgriffin@clevelandohio.gov  
dthomas3@clevelandohio.gov

#### CERTIFICATE OF SERVICE

A copy of the foregoing Declaration was sent via operation of the Court's ECF system on the day of filing to all parties of record. A courtesy copy was emailed to counsel for the United States, Patricia M. Fitzgerald (patricia.fitzgerald2@usdoj.gov); the Monitor, Karl Racine (karl.racine@hoganlovells.com); and counsel for CPC, Martin Bielat (mbielat@clevelandohio.gov).

*/s/ Mark D. Griffin*

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MARK D. GRIFFIN (0064141)  
Director of Law